

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SALON PHOENIX COSMETOLOGY LLC and  
SALON HAIRROIN, INC., on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

GROUPON, INC.,

Defendant.

Case No. 1:22-cv-07162

Hon. Lindsay C. Jenkins

**DECLARATION OF  
RAPHAEL JANOVE IN  
SUPPORT OF PLAINTIFFS'  
UNOPPOSED MOTION FOR  
FINAL APPROVAL OF  
CLASS SETTLEMENT**

I, Raphael Janove, hereby declare as follows:

1. I am an attorney with Pollock Cohen LLP and counsel of record for Plaintiffs in the above-captioned action. I make this declaration in support of Plaintiffs' Unopposed Motion for Final Approval of Class Action Settlement.
2. I have personal knowledge of the matters set forth herein and am competent to testify upon them if called upon to do so.
3. Attached as Exhibit 1 is a true and correct copy of the Parties' Settlement Agreement, executed on July 26, 2023.
4. A proposed Final Approval Order and Judgment is being emailed to the Court.
5. To date, there have been no objectors to the settlement.
6. Groupon has already implemented a disclaimer of affiliation appearing on Business Landing Pages for all Settlement Class Members who do not have a current or prior deal with Groupon.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2023.

*/s/ Raphael Janove*

Raphael Janove